

(C) Untimely Claims and Untimely Tax Claim, and (D) Claims Subject to Modification, Tax Claims Subject to Modification, and Modified Claims Asserting Reclamation (the "Response").


2. I make this Affidavit from my personal knowledge and am competent to testify about the matters stated herein.

3. On June 19, 2007, my assistant logged into the ECF/Case Management System on my behalf in order to file the Response using my ECF identification and password prior to the 4:00 p.m. deadline.

4. While attempting to link the Response to the Debtors' Fifteenth Omnibus Objection (Substantive) Pursuant to 11 U.S.C. §502(b) and Fed. R. Bankr. P. 3007 to Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected on Debtors' Books and Records, (C) Untimely Claims and Untimely Tax Claim, and (D) Claims Subject to Modification, Tax Claims Subject to Modification, and Modified Claims Asserting Reclamation (the "Claim Objection"), as required for filing, the ECF System terminated the filing session and ejected us from the ECF System prior to the filing being completed.


5. As a result of the technical problems associated with the ECF System with respect to filing the Response, we were required to re-start the filing process from the beginning, and we were unable to complete the filing until 4:10 p.m.

CLARK HILL PLC

By: 
Joel D. Applebaum (P48627)

Its: Member and duly authorized agent

Subscribed and sworn to before me
on June 21, 2007

, Notary Public
Macomb County, Michigan

My commission expires: 9-4-2011